

1 Gillian Murphy, WSBA #37200
2 Scott Prange, WSBA #53980
3 Davis Wright Tremaine LLP
4 920 Fifth Avenue, Suite 3300
5 Seattle, WA 98104-1610
6 Telephone: 206.622.3150
7 Facsimile: 206.757.7700

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT RICHLAND

MATTHEW ALLEN STERBA, and
KEELY STERBA, and their marital
community,

Plaintiffs,

v.

BATTELLE MEMORIAL INSTITUTE,
DBA PACIFIC NORTHWEST
NATIONAL LABORATORY,

Defendant.

No. 4:22-cv-05163

**VERIFICATION OF STATE
COURT RECORDS**

I hereby certify that I am counsel for Defendant Battelle Memorial Institute,
dba Pacific Northwest National Laboratory (“BMI”)¹ in the above-captioned

¹ Battelle Memorial Institute (“BMI”) operates and manages Pacific Northwest
National Laboratory (“PNNL”). BMI does not do business as PNNL. PNNL is
not a legal entity. BMI (not PNNL) is the legal entity that employs Plaintiff
Sterba.

VERIFICATION OF STATE COURT RECORDS - 1
(Case No. 4:22-cv-05163)

4864-4510-3427v.2 0021368-000030

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax

1 action. I hereby verify that the documents comprising the state court record are
2 attached as **Exhibit A** and **Exhibit B** to the Notice of Removal and include true
3 and complete copies of all the records and proceedings filed in the state court
4 action, Case No. 22-2-01969-03 in the Superior Court of Washington for Benton
5 County.

6 DATED this 19th day of December, 2022.

7 DAVIS WRIGHT TREMAINE LLP
8 *Attorneys for Defendant Battelle Memorial*
9 *Institute, dba Pacific Northwest National*
Laboratory

10 By /s/ Scott Prange
11 Gillian Murphy, WSBA #37200
12 Scott Prange, WSBA #53980
13 920 Fifth Avenue, Suite 3300
14 Seattle, WA 98104-1610
15 Telephone: 206.622.3150
16 Fax: 206.757.7700
17 Email: gillianmurphy@dwt.com
18 Email: scottprange@dwt.com
19
20
21
22
23

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the document to which this Certificate of Service is attached to be served in the manner as indicated below:

William Edelblute, WSBA #13808
William Edelblute PLLC
1030 N Center Parkway
Kennewick, WA 99336
Telephone: 509.737.0073
Fax: 509.222.2223
Email: bill@edellaw.com
Attorney for Matthew Sterba

- ☐ Via Legal Messenger
☐ Via U.S. Mail, postage prepaid
☐ Via Federal Express
☐ Via Facsimile
☐ Via Electronic Mail
☒ **Via Court ECF**

Declared under penalty of perjury under the laws of the State of Washington.

DATED at Renton, Washington this 19th day of December, 2022.

/s/ Greta Nelson

Greta Nelson, Legal Assistant
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: 206.622.3150
Fax: 206.757.7700
Email: gretanelson@dwt.com